

Methyl Bromide Fumigation of Tarped Potting Soil Piles

Date	October 31, 2003
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Enclosure to	Enforcement Letter ENF 03-37
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Distribution	County Agricultural Commissioners
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Referral	If you have any questions pertaining to this letter, please contact your senior pesticide use specialist liaison.
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Background	<p>The following guidance is intended to supplement the Department of Pesticide Regulation's (DPR's) suggested permit conditions for methyl bromide fumigation of tarped potting soil piles, which are found in Enforcement Letter ENF 94-054. Enforcement Letter ENF 94-054 is still applicable. However, it does not address fumigation of multiple piles of potting soil. Multiple potting soil fumigations are different than multiple field fumigations because of air concentrations during tarpaulin cutting and removal. For field fumigations, air concentrations during tarpaulin cutting and removal are low and no buffer zone is necessary. However, for potting soil fumigations, air concentrations during tarpaulin cutting and removal can be high, and a buffer zone is necessary.</p>
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Multiple potting soil fumigations

For multiple potting soil fumigations, DPR recommends the following guidance.

1. Piles can be considered “isolated” when they are separated by at least 1300 feet (1/4 mile).
2. Piles can also be considered isolated when they are separated by at least 48 hours from the introduction AND tarpaulin cutting of one pile to the introduction and tarpaulin cutting of another pile. For example, multiple piles can be considered isolated:
 - a. When introduction takes place at 48-hour intervals (e.g., introduction of Pile 1 on October 1 and introduction of Pile 2 on October 3).
 - b. When tarpaulin cutting takes place at 48-hour intervals (e.g., tarpaulin cutting of Pile 1 on October 1 and tarpaulin cutting of Pile 2 on October 3).
 - c. When introduction and tarpaulin cutting occur alternately at 48-hour intervals (e.g., tarpaulin cutting of Pile 1 on October 1 and introduction of Pile 2 on October 3).
3. For isolated piles, calculate buffer zones independently for each pile.

Non-isolated piles

For non-isolated piles, calculate buffer zones by aggregating the volume of the piles. This is the same procedure for calculating buffer zones for isolated and non-isolated field fumigations.
